

1 CROSNER LEGAL, P.C.
Craig W. Straub (SBN 249032)
2 Zachary M. Crosner (SBN 272295)
9440 Santa Monica Boulevard Suite 301
3 Beverly Hills, California 90210
Tel: (866) 276-7637
4 craig@crosnerlegal.com
zach@crosnerlegal.com

5 REESE LLP
6 George V. Granade (SBN 316050)
8484 Wilshire Boulevard, Suite 515
7 Los Angeles, California 90211
Tel: (310) 393-0070
8 ggranade@reesellp.com

9 REESE LLP
Michael R. Reese (SBN 206773)
10 100 West 93rd Street, 16th Floor
New York, New York 10025
11 Tel: (212) 643-0500
mreese@reesellp.com

12 *Attorneys for Plaintiffs Drew Moore and Jana*
13 *Nicole Rabinowitz and the Proposed Class*

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**

17 DREW MOORE and JANA NICOLE
18 RABINOWITZ, individually, and on behalf of
all others similarly situated,

19 Plaintiffs,

20 v.

21 EO PRODUCTS, LLC, and DOES 1-25,
22 inclusive,

23 Defendants.

Case No. 4:22-cv-07618-JST

CLASS ACTION

**NOTICE OF SETTLEMENT AND
[PROPOSED] ORDER VACATING
DEADLINES**

Judge: Honorable Jon S. Tigar

Complaint Filed: October 5, 2022
Trial Date: Not Set Yet

24
25
26
27
28
Case No. 4:22-cv-07618-JST

NOTICE OF SETTLEMENT AND [PROPOSED] ORDER VACATING DEADLINES

1 Plaintiffs Drew Moore and Jana Nicole Rabinowitz (together, “Plaintiffs”) and Defendant
2 EO Products, LLC (collectively, the “Parties”) hereby notify the Court that the Parties have agreed
3 to a resolution of this matter that will result in the filing of a Stipulation of Dismissal. The Parties
4 are working to finalize a fully integrated settlement agreement as soon as possible..

5 The Parties respectfully request that the Court vacate all upcoming deadlines set forth in the
6 September 23, 2024 amended Scheduling Order (ECF No. 62), as well as any other deadlines in this
7 case, and set a deadline of December 6, 2024, for the Parties to either file the Stipulation of Dismissal
8 With Prejudice or file a joint status report showing good cause for an extension of the deadline to
9 do so.

10
11
12 Date: November 1, 2024

Respectfully submitted,

CROSNER LEGAL, P.C.

By: /s/ Craig W. Straub

CRAIG W. STRAUB

Craig W. Straub (SBN 249032)
Zachary M. Crosner (SBN 272295)
9440 Santa Monica Boulevard Suite 301
Beverly Hills, California 90210
Tel: (310) 496-5818
craig@crosnerlegal.com
zach@crosnerlegal.com

REESE LLP
George V. Granade (SBN 316050)
8484 Wilshire Boulevard, Suite 515
Los Angeles, California 90211
Tel: (310) 393-0070
ggranade@reesellp.com

REESE LLP
Michael R. Reese (SBN 206773)
100 West 93rd Street, 16th Floor
New York, New York 10025
Tel: (212) 643-0500
mreese@reesellp.com

*Attorneys for Plaintiffs Drew Moore and Jana
Nicole Rabinowitz and the Proposed Class*

1 Date: November 1, 2024

AMIN WASSERMAN GURNANI, LLP

2 By: /s/ William P. Cole

3 WILLIAM P. COLE

4 William P. Cole, Bar No. 186772
5 Matthew R. Orr, Bar No. 211097
6 Angela L. Diesch, Bar No. 256253
7 Richard L. Hyde, Bar No. 286023
8 AMIN WASSERMAN GURNANI, LLP
9 515 South Flower Street, 18th Floor
10 Los Angeles, California 90071
11 Tel: (213) 933-2330
12 wcole@awglaw.com
13 morr@awglaw.com
14 adiesch@awglaw.com
15 rhyde@awglaw.com

Attorneys for Defendant EO Products, LLC

12 **SIGNATURE ATTESTATION**

13 Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories
14 have concurred in its filing.

15 Date: November 1, 2024

16 By: /s/ Craig W. Straub
CRAIG W. STRAUB

17 CROSNER LEGAL, P.C.
18 9440 Santa Monica Boulevard Suite 301
19 Beverly Hills, California 90210
20 Tel: (310) 496-5818
21 craig@crosnerlegal.com

Attorneys for Plaintiffs Drew Moore and Jana Nicole
Rabinowitz and the Proposed Class

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

The Court, having considered the foregoing stipulation submitted by Plaintiffs Drew Moore and Jana Nicole Rabinowitz and Defendant EO Products, LLC, hereby finds good cause and **ORDERS** that all upcoming deadlines set forth in the September 23, 2024 amended Scheduling Order (ECF No. 62), as well as any other deadlines in this case, are vacated. The Court further **ORDERS** that on or before December 6, 2024, the Parties shall either file a Stipulation of Dismissal With Prejudice or file a joint status report showing good cause for an extension of the deadline to do so.

IT IS SO ORDERED.

Date: _____
Honorable Jon S. Tigar
United States District Judge